

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

JOHN G. PEDICINI,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	Case No. 04-12395-JLT
UNITED STATES OF AMERICA,	:	
ANN M. VENEMAN, SECRETARY,	:	
UNITED STATES DEPARTMENT OF	:	
AGRICULTURE, AND LINDA	:	
SPRINGER, DIRECTOR, UNITED	:	
STATES OFFICE OF PERSONNEL	:	
MANAGEMENT,	:	
	:	
Defendants.	:	

**DEFENDANTS' MOTION FOR LEAVE TO FILE MEMORANDUM  
OF LAW IN EXCESS OF TWENTY PAGES (ASSENTED TO)**

Defendants, the United States of America, Ann M. Veneman, Secretary of the United States Department of Agriculture, and Linda Springer,<sup>1</sup> Director of the United States Office of Personnel Management, by their attorney, Michael J. Sullivan, the United States Attorney for the District of Massachusetts, hereby move for leave from Local Rule 7.1(B)(4) to file a Memorandum of Law in Support of its Cross-Motion for Summary Judgment that exceeds twenty (20) pages. The government believes that the memorandum, which is only twenty-eight (28) pages, clarifies the issues before the Court and will assist it in reaching a decision on its motion for summary judgment.

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<sup>1</sup> Pursuant to Federal Rule of Civil Procedure 25(d)(1), the new Director of the United States Office of Personnel Management, Linda Springer, is hereby substituted for Dan G. Blair as a defendant in this case.

Respectfully submitted,

Michael J. Sullivan  
United States Attorney

BY: /s/ Damian W. Wilmot  
DAMIAN W. WILMOT  
Assistant U.S. Attorney  
Moakley Federal Courthouse  
One Courthouse Way, Suite 9200  
Boston, MA 02110  
(617) 748-3398

Dated: March 23, 2006

**CERTIFICATION UNDER L.R. 7.1**

I certify that in accordance with Local Rule 7.1, on March 22, 2006, I have conferred with the *pro se* Plaintiff and he assents to the above motion.

/s/ Damian W. Wilmot  
DAMIAN W. WILMOT  
Assistant U.S. Attorney

**CERTIFICATE OF SERVICE**

I certify that on March 23, 2006, I caused a copy of the foregoing document to be served on *pro se* Plaintiff, John G. Pedicini, 10 Milano Drive, Saugus, MA 01906, by first class mail, postage pre-paid.

/s/ Damian W. Wilmot  
DAMIAN W. WILMOT  
Assistant U.S. Attorney